

WINDJAMMER COMMUNICATIONS, LLC

Statement of CPNI Usage and Regulatory Compliance

The internal operating procedures and practices of Windjammer Communications LLC (“Windjammer”) are designed to ensure that Windjammer complies with the Federal Communications Commission (“FCC”) rules governing the use and disclosure of Customer Proprietary Network Information (“CPNI”), as set forth at 47 C.F.R. § 64.2001, *et seq.* Windjammer’s compliance with the FCC’s CPNI rules is demonstrated by the policies, practices, and training procedures detailed below.

In connection with the use of CPNI for marketing purposes, Windjammer does not use CPNI for the purpose of marketing service offerings that are not within the category of service that Windjammer provides to customers. Windjammer may use CPNI to market service offerings within the same categories of service to which the customer already subscribes. Windjammer has established a supervisory review and approval process that calls for records of such marketing campaigns to be maintained for a minimum of one year.

Windjammer does not release or disclose customer CPNI to third parties for marketing purposes. However, the Company may release CPNI as required by law or as described in the following paragraph. As such, without the customer’s written consent, CPNI will be disclosed only if the request is made pursuant to a valid court order, warrant or appropriate notice from a government agency. Other than as described above, Windjammer only releases or discloses customers’ CPNI for the express limited purpose of initiating, rendering, billing and/or collecting for services rendered by Windjammer. In such cases, disclosure is made only pursuant to a written and binding service agreement that includes terms governing the permitted uses, as well as the confidentiality and safeguarding of CPNI.

Windjammer takes reasonable measures to protect against the unauthorized release of any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call (“Call Detail Information”). Windjammer’s customer service representatives do not discuss or disclose customers’ Call Detail Information on customer initiated telephone calls, except the limited discussion of Call Detail Information after the customer first, without the customer service representatives’ assistance, identifies and provides specific information about the particular call to be discussed, including the call date, call time, and telephone number called. Accordingly, Windjammer has not established account passwords for telephone access to Call Detail Information. When a customer requests Call Detail Information during a customer initiated telephone call, Windjammer provides that information by directing the customer to Windjammer’s secure online Web portal and/or by mailing the Call Detail Information to the customer’s address of record.

Windjammer does not provide any access to customers’ Call Detail Information or other CPNI via an online web portal until the customer requesting such information provides a password that does not make use of readily available biographical information and that has been

established by the customer after he or she has been authenticated in compliance with the FCC's rules. Windjammer notifies customers immediately whenever a customer's password, means of authentication, online account or address associated with the account is created or changed.

Windjammer does not provide customers with access to CPNI at retail locations unless the customer has presented a valid, government issued photo identification matching the customer's account information.

Windjammer provides CPNI to business customers only as described above, or for business customers who have been assigned a dedicated account representative, pursuant to contractual provisions that specifically address the protection of CPNI.

Windjammer also employs several internal operating processes and procedures to ensure compliance with the FCC's CPNI regulations. Windjammer requires that all relevant personnel are informed of and follow company-approved procedures for authenticating customers before disclosing CPNI. Windjammer administers an employee disciplinary program to ensure compliance with internal procedures. This program includes penalties for the violation of internal privacy protection procedures, including the potential termination of employees, when appropriate. Windjammer has standardized processes for tracking and resolving customer complaints that relate to unauthorized access to CPNI and for identifying, responding to, documenting and, as appropriate, notifying law enforcement and customers of any breaches of customer CPNI. In addition, Windjammer has made materials publicly available that inform customers about CPNI protections and Windjammer's authentication and protection practices.